

John S. Delikanakis, Esq.  
Nevada Bar No. 5928  
Joseph G. Adams, Esq. (admitted *pro hac vice*)  
Christian P. Ogata, Esq.  
Nevada Bar No. 15612  
SNELL & WILMER L.L.P.  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169  
Telephone: (702) 784-5200  
Facsimile: (702) 784-5252  
jdelikanakis@swlaw.com  
jgadams@swlaw.com  
cogata@swlaw.com

*Attorneys for Defendant  
Teachers Health Trust d/b/a THT Health*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Luanne Austin, individually, on behalf of  
herself and all others similarly situated,

Plaintiffs

v.

Allied Collection Services, Inc., et al,

Defendants

Case No.: 2:21-cv-01593-CDS-NJK

**Stipulation and Order to Extend  
Movants' Deadline to File Reply in  
Support of Motion for Determination of  
Good Faith Settlement**

**FIRST REQUEST**

Movants Teachers Health Trust d/b/a THT Health and plaintiff Luanne Austin, and defendant Allied Collection Services, Inc., for good cause shown, stipulate to extend Movants' deadline to file their reply in support of their joint motion for determination of good faith settlement to April 13, 2023, for the following reasons:

1. On March 8, 2023, THT Health and Austin moved for determination of good faith settlement under Nevada Revised Statute § 17.245.<sup>1</sup>

<sup>1</sup> ECF No. 73.

1           2.       Allied responded to that motion on March 22, 2023.<sup>2</sup> That day, Movants and  
2 defendant Digestive Disease Center (“DDS”) filed a stipulation to extend DDS’s response  
3 deadline.<sup>3</sup>

4           3.       This Court granted the stipulation on March 27, 2023, making DDS’s response  
5 deadline April 6, 2023, and Movants’ reply deadline April 13, 2023.<sup>4</sup>

6           4.       The filing of Allied’s response triggered a second, earlier reply deadline of March  
7 29, 2023.

8           5.       To streamline the briefing on the motion, Movants now seek to consolidate the reply  
9 deadlines to April 13, 2023, so all reply briefing is completed on the same date, and therefore aiding  
10 judicial economy.

11          6.       The Parties have agreed to the requested extension in good faith.

12          7.       Good cause exists to extend the March 29th deadline to ensure that the deadlines in  
13 support of the same motion are consolidated.

---

26       <sup>2</sup> ECF No. 80.

27       <sup>3</sup> ECF No. 81.

28       <sup>4</sup> *See* ECF No. 82.

1 Therefore, the Parties respectfully request an extension for Movants' to file their reply up  
2 to and including April 13, 2023.

3 DATED: March 29, 2023.

DATED: March 29, 2023.

4 MADDOX & CISNEROS, LLP

SNELL & WILMER L.L.P.

5 /s/Norberto J. Cisneros

/s/ John S. Delikanakis

6 Norberto J. Cisneros, Esq.  
7 Barbara M. McDonald, Esq.  
8 3230 S. Buffalo Drive # 108  
9 Las Vegas, Nevada 89117

John S. Delikanakis, Esq. (Bar No. 5928)  
Joseph G. Adams, Esq. (admitted *pro hac vice*)  
Christian P. Ogata, Esq. (Bar No. 15612)  
3883 Howard Hughes Parkway, Suite 1100  
Las Vegas, Nevada 89169

10 *Attorneys for Plaintiff*

*Attorneys for Defendant Teachers Health Trust*

11 DATED: March 29, 2023.

12 GORDON REESE SCULLY  
13 MANSUKHANI, LLP

14 /s/ Sean Flynn

15 Sean Flynn, Esq.  
16 300 S. 4th Street, Suite 1550  
17 Las Vegas, Nevada 89101

18 *Attorney for Defendant Allied Collection*  
19 *Services*

20 **ORDER**

21 Good cause appearing, **IT IS HEREBY ORDERED** that Movants' reply deadline for their  
22 motion for determination of good faith settlement shall be April 13, 2023.

23 **IT IS SO ORDERED.**

24   
25 UNITED STATES DISTRICT JUDGE

26 DATED: April 4, 2023